



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

JAMES E. JOHNSON  
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USDC SDNY  
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February 10, 2021

**By ECF**

Honorable Mary Kay Vyskocil  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Williams v. City of New York et al.  
20 CV 0516 (MKV)

Dear Judge Vyskocil:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel assigned to represent the Defendants in the above-referenced matter. I write to respectfully request a seventeen (17) day extension of time to submit Defendants' Reply, from February 12, 2021 to March 1, 2021.

By way of background, on January 17, 2020, Plaintiff *pro se* Alexander Williams commenced this 42 U.S.C. § 1983 action against the City of New York, the New York City Health & Hospitals Corporation's Correctional Health Services, and ten (10) City employees for alleged violations of his constitutional right to medical confidentiality, among other claims. (Dkt. No. 2) Plaintiff's initial Complaint was superseded by the filing of two amended complaints, dated May 21, 2020 and October 14, 2020 respectively. (Dkt. Nos. 20, 29)

On December 4, 2020, Defendants moved to dismiss the Second Amended Complaint, the operative pleading document. (Dkt. Nos. 34, 35) On December 30, 2020, Plaintiff filed an Opposition, which contained arguments that could not be deciphered due to scanning or other filing issues. (Dkt. No. 37) As such, by letter dated January 13, 2021, Defendants requested that the Court decline to consider Plaintiff's Opposition due to its incomprehensibility or, in the alternative, direct Plaintiff to resubmit an identical copy of the Opposition in legible form by January 29, 2021. (Dkt. No. 38)

Defendants are now in possession of a legible copy of Plaintiff's Opposition and are in a position to address Plaintiff's arguments.<sup>1</sup> As Plaintiff's Opposition appears to raise new claims and challenges additional policies that require further collaboration with various agencies, Defendants respectfully request an extension of time – from February 12, 2021 to March 1, 2021 – to submit a Reply. This is Defendants' first request for an extension of time to submit the Reply. As Plaintiff is currently incarcerated, it was not practicable to obtain his consent to this request in a timely fashion.

Thank you for your consideration of this request.

Respectfully yours,

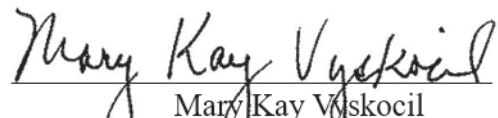
/s/ Sherry N. Glover

SHERRY N. GLOVER  
Assistant Corporation Counsel

CC: **BY FIRST CLASS MAIL**  
Alexander Williams (NYSID: 0197858L)  
Plaintiff, *pro se*  
George R. Vierno Center  
09-09 Hazen Street  
East Elmhurst, New York 11370

Defendants' request for an extension of time to submit a reply in further support of their motion to dismiss is GRANTED IN PART. Defendants shall file their reply by February 25, 2021. Defendants' earlier motion to compel Plaintiff to submit a legible copy of his brief in opposition to the motion to dismiss [ECF #38] is DENIED as moot. The Clerk of Court is respectfully directed to terminate the motions pending at docket entries 38 and 40.

Date: February 11, 2021  
New York, New York

  
Mary Kay Vyskocil  
United States District Judge

<sup>1</sup> On or about February 5, 2021, Defendants received an ECF email notice and a hard copy of Plaintiff's letter, dated January 25, 2021, with an annexed copy of Plaintiff's Opposition in legible form. (See Dkt. No. 39)